

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION (CINCINNATI)**

JEANNETTE CONRAD,)	CASE NO. 1:18-cv-00764
)	
Plaintiff,)	JUDGE TIMOTHY S. BLACK
)	
v.)	
)	
US BANK, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**PLAINTIFF’S MOTION FOR LEAVE TO RESPOND, *INSTANTER*, TO
DEFENDANTS’ MOTION FOR PARTIAL JUDGMENT ON THE PLEADINGS
DIRECTED TO PLAINTIFF’S AMENDED COMPLAINT**

NOW COMES Plaintiff Jeannette Conrad, through counsel, and respectfully requests leave, *instante*, to file her Brief in Opposition to Defendants’ Motion for Partial Judgment on the Pleadings Directed to Plaintiff’s Amended Complaint. (Doc. No. 16). Pursuant to Local Rule 7.2(a)(2), Plaintiff’s response should have been filed by February 5, 2019. However, due to excusable neglect on undersigned counsel’s part, counsel inadvertently calendared the wrong date for his response. Immediately upon realizing his error, counsel prepared the within Motion, as well as his Opposition to Defendants’ Motion. Plaintiff’s Motion and Opposition are being filed only one week beyond the deadline prescribed by the Local Rules, and such a short delay should not prejudice the Defendants in any way.

WHEREFORE, Plaintiff respectfully requests leave, *instante*, to file her Brief in Opposition to Defendants’ Motion for Partial Judgment on the Pleadings Directed to Plaintiff’s Amended Complaint, which is attached hereto as Exhibit A and incorporated by reference.

Respectfully submitted,

/s/ Matthew G. Bruce
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Attorney for Plaintiff Jeannette Conrad

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on February 12, 2019, a true and accurate copy of the foregoing was filed with the Court's CM/ECF document filing system, which will serve an electronic copy on the following:

Gregory Parker Rogers, Esq.
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